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12                   UNITED STATES DISTRICT COURT  
13                   EASTERN DISTRICT OF WASHINGTON

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15                   UNITED STATES OF AMERICA,

Case No. 2:21-cr-00049-WFN

16  
17                   Plaintiff,

**DEFENDANT'S MOTION FOR  
OVERLENGTH BRIEF RE:  
DEFENDANT'S MOTION TO  
REVOKE PRETRIAL DETENTION  
ORDER**

18  
19                   vs.  
20                   RONALD CRAIG ILG,

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22                   Defendant.

With Oral Argument:  
November 18, 2021 at 11:00 am  
Via Videoconference

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26                   COMES NOW, the Defendant RONALD CRAIG ILG, by and through his  
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28 attorneys of record, Carl J. Oreskovich and Andrew M. Wagley of Etter,  
29  
30 McMahon, Lamberson, Van Wert & Oreskovich, P.C., and hereby moves the  
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1 Court for an Order permitting Defendant to submit an overlength brief for  
 2 Defendant's Motion to Revoke Pretrial Detention Order. In the accompanying  
 3 Motion to Revoke Pretrial Detention Order, the Defendant respectfully requests  
 4 the Court revoke his pretrial detention and grant his release from custody  
 5 pending trial.

6 Pursuant to LCivR 7(f)(2), “[n]ondispositive motions . . . shall not exceed  
 7 10 pages.” In turn, LCivR 7(b)(3) indicates “[a] ‘dispositive motion’ is a motion  
 8 requesting summary judgment, judgment on the pleadings, dismissal, remand, or  
 9 permanent injunctive relief. A ‘nondispositive motion’ is a motion seeking any  
 10 other relief.” As such, pursuant to LCivR 7, Defendant's to Revoke Pretrial  
 11 Detention Order is a “nondispositive motion” that is subject to a 10-page limit.  
 12 However, page limits “may only be exceeded by obtaining prior approval of the  
 13 Court. A motion to exceed page limits must demonstrate good cause and recite  
 14 the opposing party’s position.” LCivR 7(f)(5).

15 Defendant's Motion to Revoke Pretrial Detention Order is brought  
 16 pursuant to the Bail Reform Act (“BRA”), 18 U.S.C. § 3141, *et seq.*, along with  
 17 the Due Process Clause. In addition, Defendant's Motion is supported by the  
 18 Forensic Psychological Evaluations of two expert witnesses. The various in-  
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1 depth analysis required under the BRA and Due Process Clause would be  
2 insufficient in a brief under 10-pages. Moreover, Assistant United States  
3 Attorney Richard Barker has been apprised of this Motion for Overlength Brief  
4 and indicated the United States has no objection. As such, good cause exists to  
5 grant this Motion for Overlength Brief.

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8 RESPECTFULLY SUBMITTED this 10th day of November, 2021.  
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11 ETTER, McMAHON, LAMBERSON,  
12 VAN WERT & ORESKOVICH, P.C.  
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15 By: /s/ Andrew M. Wagley  
16 Carl J. Oreskovich, WSBA #12779  
17 Andrew M. Wagley, WSBA #50007  
18 *Attorneys for Defendant Ronald Craig Ilg*  
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## **CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury of the laws of the United States and the State of Washington that on the 10th day of November, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System, which will send electronic service to all attorneys of record.

EXECUTED this 10th day of November, 2021 in Spokane, WA.

By: /s/ Jodi Dineen  
Jodi Dineen